

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Alexander Norris,

Plaintiff,

- against –

Marc Goldner, Individually and as Officer of
Golden Bell Entertainment, LLC, a California
Company and Golden Bell Studios, LLC,
Golden Bell Entertainment, LLC, a California
Company and Golden Bell Studios, LLC,

Defendants.

Civil Action No.: 1:19-cv-05491-PAE-SN

**Declaration Of Francelina M. Perdomo Klukosky In Support Of Plaintiff's Motion For
Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976**

I, Francelina M. Perdomo Klukosky, hereby declare and state as follows:

1. I am Counsel with the law firm Saul Ewing LLP, attorneys for Plaintiff Alexander Norris ("Plaintiff") in the above-caption matter.
2. I submit this Declaration In Support Of Plaintiff's Motion For Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976 (the "Motion").
3. All exhibits annexed hereto are referenced in Plaintiff's Memorandum of Law submitted in support of the Motion.
4. Annexed hereto as **Exhibit A** are true and accurate copies of Plaintiff's legal bills from my prior law firm, Gallet Dreyer & Berkey, LLP, totaling \$194,272.88.
5. Annexed hereto as **Exhibit B** are true and accurate copies of Plaintiff's legal bills from my current law firm, Saul Ewing LLP totaling \$79,236.61 as of October 30, 2023.
6. As of the date of this Declaration, Plaintiff has expended a total of \$273,509.49 in attorneys' fees.

7. As the responsible attorney for this Action, I have reviewed and approved all of Plaintiff's legal bills from both law firms.

8. I have been a practicing attorney for approximately twenty years, and have been practicing intellectual property law for approximately 15 years.

9. Based on my years of experience, I certify that the amount of attorney time expended on all tasks in this Action has been reasonable necessary and in furtherance of this Action.

I hereby declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this the 22nd day of December, 2023 in New York, New York.

/s/ Francelina M. Perdomo Klukosky

Francelina M. Perdomo Klukosky
SAUL EWING LLP
1270 Avenue of the Americas, Suite 2800
New York, NY 10020
(212) 980-7200
francelina.perdomoklukosky@saul.com
Attorneys for Plaintiff
Alexander Norris

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Declaration of Francelina M. Perdomo Klukosky in Support Of Plaintiff's Motion For Statutory Damages and Attorneys' Fees Pursuant To The Copyright Act of 1976 was filed with the Clerk on this date and sent to all counsel via CM/ECF as follows:

Gerard Fox, Esq.
Kathryn Lunn, Esq.
GERARD FOX LAW P.C.
1880 Century Park East, Suite 1410
Los Angeles, California 90067
Counsel for Defendants
Marc Goldner, Golden Bell Entertainment, LLC and Golden Bell Studios, LLC

This the 22nd day of December, 2023.

/s/ Francelina M. Perdomo Klukosky
Francelina M. Perdomo Klukosky